

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
LINDRAN PROPERTIES, LLC (SHORELINE)	)	Case No. 20-02834
	)	
Debtor.	)	Hon. Jack B. Schmetterer
	)	
	)	

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**AMENDED NOTICE OF APPLICATION TO AUTHORIZE THE RETENTION AND  
EMPLOYMENT OF CLARK HILL PLC AS BANKRUPTCY COUNSEL**

**PLEASE TAKE NOTICE** that on **February 25, 2020 at 10:00 a.m.** (prevailing Central Time) or as soon thereafter as counsel may be heard, we shall appear before the Honorable Jack B. Schmetterer in Courtroom 682 in the United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, or before any other judge who may be sitting in his place and stead, and present the *Application to Authorize the Retention and Employment of Clark Hill PLC* (the “Application”), at which time and place you may appear if you so desire

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Dated: February 17, 2020

Respectfully submitted,

**LINDRAN PROPERTIES, LLC  
(SHORELINE)**

By: /s/ Kevin H. Morse

One of Its Proposed Attorneys

Scott N. Schreiber (#06191042)  
Kevin H. Morse (#06297244)  
CLARK HILL PLC  
130 East Randolph Street | Suite 3900  
Chicago, Illinois 60601  
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kmorse@clarkhill.com

I, Kevin H. Morse, an attorney, certify that I caused a copy of the following documents Amended Notice of Motion and Application to Employ Clark Hill PLC as Bankruptcy Counsel to the Debtor [Docket No. 25] to be served on the parties listed on the attached service lists via the Court's CM/ECF System (**Exhibit A**) and/or U.S. Mail, postage prepaid (**Exhibit B**), on February 17, 2020.

Dated: February 17, 2020

By: /s/ Kevin H. Morse

**Exhibit A**

William S Hackney, III  
Better Housing Foundation LLC  
whackney@salawus.com  
jadams@salawus.com  
dkreide@salawus.com

James Kapp  
UMB Bank, n.a., as successor Indenture Trustee  
jkapp@mwe.com

Charles A King  
City of Chicago  
chuck.king@cityofchicago.org

Patrick S Layng  
USTPRegion11.ES.ECF@usdoj.gov

Kevin H Morse  
Lindran Properties, LLC (Shoreline)  
kmorse@clarkhill.com

Joseph M Robinson  
UMB Bank, n.a., as successor Indenture Trustee  
jmrobinson@mwe.com

Scott N. Schreiber  
Lindran Properties, LLC (Shoreline)  
sschreiber@clarkhill.com, blambert@clarkhill.com

Eric E. Walker  
PRE Holdings 14, LLC  
ewalker@perkinscoie.com  
Docketchi@perkinscoie.com  
rleibowitz@perkinscoie.com

**Exhibit B**

Lindran Properties, LLC (Shoreline)  
4 Dunbar Road  
Palm Beach Gardens, Florida 33418-6816

All Types Elevators, Inc.  
c/o Laurie Silvestri, Esq.  
70 West Madison Street | Suite 2020  
Chicago, Illinois 60602-4241

Bryant & Davalle PC  
1210 West Northwest Highway  
Palatine, Illinois 60067-1897

CII, as Receiver for the Property  
c/o Megan McGillivray  
29 East Madison Street | Suite 950  
Chicago, Illinois 60602-4535

Carpet Concepts Company  
1346 West 79<sup>th</sup> Street  
Chicago, Illinois 60620-3714

City of Chicago  
Attention: Legal Department  
121 North LaSalle Street | Suite 600  
Chicago, Illinois 60602-1244

City of Chicago – Legal Department  
Attention: Greg Janes, Building & License  
30 North LaSalle Street | Suite 700  
Chicago, Illinois 60602-2503

City of Chicago  
Attention: Water Department  
121 North LaSalle Street | Room 107A  
Chicago, Illinois 60602-1232

Community Initiatives, Inc., Receiver  
222 South Riverside Plaza | #380  
Chicago, Illinois 60606-7801

Department of Treasury  
Internal Revenue Service  
P.O. Box 7346  
Philadelphia, Pennsylvania 19101-7346

HD Supply / Peachtree Business Products  
1940 West Oak Circle  
Marietta, Georgia 30062

Halsted Law Group LLC  
520 North Halsted Street | Apt. 201  
Chicago, Illinois 60642-7566

Illinois Department of Employment Security  
Benefit Payment Control Division  
P.O. Box 4385  
Chicago, Illinois 60680-4385

ILLINOIS DEPARTMENT OF REVENUE  
Attention: Bankruptcy Unit  
P.O. Box 19035  
Springfield, Illinois 62794-9035

Illinois Finance Authority – Legal  
Attention: Elizabeth Weber  
160 North LaSalle Street | Suite S-1000  
Chicago, Illinois 60601-3124

Independent Recycling Services, Inc.  
2401 South Laflin Street  
Chicago, Illinois 60608-5005

Lakeshore Recycling Systems LLC  
6132 Oakton Street  
Morton Grove, Illinois 60053-2718

Michael Keefe dba Keefe HVAC  
7408 West Archer Avenue  
Summit Argo, Illinois 60501-1218

PRE Holdings 14, LLC  
c/o Eric Walker, Perkins Coie LLP  
131 South Dearborn Street | Suite 1700  
Chicago, Illinois 60603-5559

Paperstreet Properties  
1641 Carrol Avenue | Suite 201  
Chicago, Illinois 60612-2506

Region Snow Removal LLC  
328 West Old Ridge Road  
Hobart, Indiana 46342-4242

The Lynd Company  
4001 Pond Hill Road  
San Antonio, Texas 78231-1291

UMB Bank N.A.  
c/o William Smith  
McDermott Will & Emery LLP  
444 West Lake Street | Suite 4000  
Chicago, Illinois 60606-0029

Unique Equity Property Investments LLC  
6411 South Parnell Avenue  
Chicago, Illinois 60621-2719

Patrick S. Layng  
Office of the U.S. Trustee, Region 11  
219 South Dearborn Street | Room 873  
Chicago, Illinois 60604-2027

Law Offices of Ira Piltz Ltd.  
8170 McCormick Boulevard | Suite 116  
Skokie, Illinois 60076-2914

Midwest Receivable Solution  
P.O. Box 2087  
Kalamazoo, Michigan 49003-2087

PRE Holdings 14, LLC  
c/o Krusha Patel  
549 West Randolph Street | 2<sup>nd</sup> Floor  
Chicago, Illinois 60661-2208

Peoples Gas  
200 East Randolph Street  
Chicago, Illinois 60601-6302

Resynergy Bill LLC  
7575 North Loop 1604 West | Suite 10  
San Antonio, Texas 78249-2968

UMB Bank N.A.  
c/o Michael Slade, Indenture Trustee  
120 6<sup>th</sup> Street | Suite 1400  
Minneapolis, Minnesota 55402-1807

US Securities & Exchange Commission  
175 West Jackson Boulevard | Suite 900  
Chicago, Illinois 60604-2908

Wortham Insurance & Risk Management  
1600 West 7<sup>th</sup> Street  
Fort Worth, Texas 76102-2596